

A NEWPORT TELEPHONE COMPANY

February 14, 2019

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, SW Suite TW-A325 Washington, DC 20554

> Re: EB Docket No. 06-36 Section 64.2009(e) CPNI Certification NTCNet Telecom, Inc. (Form 499-A Filer ID No. 819656)

Dear Ms. Dortch:

Attached for filing is the Section 64.2009(e) Customer Proprietary Network Information Certification on behalf of NTCNet Telecom, Inc. (Form 499-A Filer ID No. 819656).

Please contact the undersigned should you have any questions or require additional information.

Respectfully submitted,

Joseph Tomaino

Vice President of Operations

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018

Date filed: 2/14/19

Name of company(s) covered by this certification: NTCNet Telecom, Inc.

Form 499 Filer ID: 819656

Name of signatory: Joseph Tomaino

Title of signatory: Vice President of Operations

I, Joseph Tomaino, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted, or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed Intal

NTCNet Telecom, Inc. STATEMENT OF COMPANY POLICY

When referred to in the guidelines set forth below, "Company," "we," or "us" refers to and includes all employees, associates, and agents of NTCNet Telecom, Inc.

NTCNet Telecom, Inc. (the "Company") has a duty to protect the confidential, Customer Proprietary Network Information ("CPNI") of our customers, other telecommunications carriers, and equipment manufacturers. Therefore, the following guidelines shall be followed by all employees and agents of the Company:

CPNI is any information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship. CPNI also includes information contained in the bills pertaining to the telephone exchange service or telephone toll service received by a customer of a carrier.

- Proprietary information of our customers, other telecommunications carriers, and equipment manufacturers is protected by Federal law.
- CPNI which the Company obtains from another carrier for the purpose of providing a particular telecommunications service may be used only for the provision of that service, and may not be used for any otherwise unrelated marketing efforts.
- Individually identifiable CPNI that we obtain by providing a telecommunications service may be used, disclosed, or released *only* in the circumstances as set forth in the Company's CPNI Operating Guidelines.

The release of any CPNI by sales personnel must be authorized by a supervisor.

The Company takes seriously the protection of our customers' CPNI, and in accordance with 47 C.F.R. § 64.2009 will be subject to disciplinary review for violation of the policies set forth above. Please contact your supervisor if you have any questions or require additional information.